

United States Bankruptcy Court
District of Oregon

In re:
Karamanos Holdings, Inc.
Debtor

Case No. 18-31646-pcm
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0979-3

User: Admin.
Form ID: pdf015

Page 1 of 1
Total Noticed: 2

Date Rcvd: Apr 10, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on
Apr 12, 2019.

db +Karamanos Holdings, Inc., 801 NE 21st Ave., Portland, OR 97232-2209
101706707 +Wells Fargo Vendor, Financial Services, LLC, ATTN: Kimberly Park,
1010 Thomas Edison Blvd SW, Cedar Rapids, IA 52404-8247

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Apr 12, 2019

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email)
system on April 10, 2019 at the address(es) listed below:
NONE. TOTAL: 0

IT IS ORDERED that if no response or withdrawal of the objection is filed within 35 days from the date in the FILED stamp above, the objection will be sustained without further order and the claim will be treated as provided in paragraph 3 below.

IT IS FURTHER ORDERED that, within 5 days of the FILED date of this order, the objecting party must serve, as necessary, this objection with the Notice of Objection of Claim and file a separate certificate of service.



PETER C. MCKITTRICK
U.S. Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

**Sunshine Wind Down, LLC; and
Karamanos Holdings, Inc.**

)
) Case No. **18-31646-pcm11**
)

)
) **OBJECTION TO CLAIM, AND
ORDER THEREON**
)

Debtor(s)

)
)
)

1. The undersigned objects to Claim No. **5-1** filed in the amount of \$ **65,103.79** by:

Claimant's name: **Wells Fargo Vendor Financial Services, LLC**

Proof of Claim Notice Address:

**Wells Fargo Vendor Financial Services LLC
Attn: Kimberly Park
1010 Thomas Edison Blvd. SW
Cedar Rapids, IA 52404**

FRBP 7004(h) Service Address, if
applicable (objecting party must serve)

**Wells Fargo
Attn: Tim Sloan, CEO
420 Montgomery Street
San Francisco, CA 94104**

2. The undersigned objects to such claim on the ground(s) it (check all applicable sections):

- ☐ Duplicates Claim No. _____ filed by _____
- ☐ Fails to assert grounds for priority.
- ☐ Was not filed on behalf of a real party in interest (e.g., does not include a copy of the assignment(s) upon which it is based).
- ☐ Appears to include interest or charges accrued after the filing.
- ☐ Appears that value of collateral exceeds debt.
- ☐ Arrearage asserted is incorrect.
- ☐ The creditor filed a secured claim, but neither: (a) specified that any portion of the claim should be treated as unsecured nor (b) requested a hearing to determine the value of their collateral, and therefore the trustee objects to any portion of the claim being treated as unsecured.
- ☐ The creditor filed a claim for taxes assessed against real or personal property of the debtor(s). The undersigned represents that the interest of the estate in the real or personal property against which the above taxes were assessed has no value in that the estate has no equity or interest in such property, and so under the provisions of 11 U.S.C. §502(b) no order can be made for payment of such taxes.
- ☐ Proof of claim does not include documentation required by FRBP 3001(c) and (d) (e.g., a copy of the note, or documents establishing secured status).
- ☒ Other:
Some of the equipment leased to Debtor was never delivered, and some equipment was returned by Debtor and subsequently sold by creditor's affiliated vendor.

3. The undersigned recommends said claim be (check applicable box(es)):

- ☒ Disallowed in full.
- ☐ (If objection is based on failure to provide documentation) Disallowed for distribution: If an amended claim including the required documentation is not filed within 30 days of the filed date noted above, no distribution on account of the claim will be made by the trustee or debtor.
- ☐ Allowed as a SECURED claim for \$ _____ a PRIORITY UNSECURED claim for \$ _____; AND a NONPRIORITY UNSECURED claim for \$ _____.
[You must fill in each blank even if it is \$0.]
- ☐ (If amount of arrearage is contested) The amount of the arrearage is \$ _____.

4. **THE UNDERSIGNED CERTIFIES THAT:**

- a. The undersigned will make any required service of this objection and file a separate certificate of service.
- b. If this objection is filed in a chapter 11 case, the undersigned has complied with LBR 3007-1(b)(2) (requiring pre-filing conferral).
- c. A copy of any Withdrawal of this Objection will be served on all parties that were served a copy of this Objection (i.e., the U.S. Trustee, any trustee, debtor(s), the creditor at the address shown above, and their respective attorneys; and, if the creditor is a federal agency, on the U.S. Attorney for the District of Oregon and the U.S. Attorney General).

DATE: 04/10/19 /s/ Nicholas J. Henderson, OSB #074027, Attorney for Debtor
Objecting Party Signature AND Relation to Case
Karamanos Holdings, Inc. , c/o M&B 117 SW Taylor St., #300
Objecting Party Name AND Service Address (Type or Print)
Portland, OR 97204; Phone: 503-417-0508
Objecting Party Phone Number
630 Duarte Rd., #208, Arcadia, CA 91007 EIN: ~2580
(If Debtor is Objecting Party) Debtor's Address AND Taxpayer I.D.#(s)
(last 4 digits)